REMARKS

Applicant thanks the Examiner for the remarks and analysis contained in the Office Action. Claim 15 is amended above. Claim 17 is rewritten in independent form. Claims, 1, 3-9 and 11-17 are pending in this application. Applicant respectfully requests reconsideration of this application.

Applicant respectfully traverses the rejection under 35 U.S.C. §102 of claims 15 and 16 based upon *Hull*. *Hull* discloses an endless power transmission belt. That is not the same as an elevator belt that has distinct, separate longitudinal ends. An endless transmission belt forms a closed loop. There is no anticipation.

Applicant respectfully traverses the rejections under 35 U.S.C. §103 based upon the proposed combination of *Baranda, et al.* and *Yaginuma*. There is no motivation for making the proposed combination and no *prima facie* case of obviousness. *Baranda, et al.* does not teach using a 320 mm sheave with the belt 24. That size sheave is described in *Baranda, et al.* as being used with a steel rope. *Baranda, et al.* then teaches that a belt having an aspect ratio consistent with *Baranda's* teachings allows for using a much smaller diameter sheave. In column 7, lines 33-44, *Baranda, et al.* teach that by using a belt instead of a round steel rope, sheave diameter reductions can be as much as 80%. Taking an 80% reduction of the 320 mm sheave described in column 1 of *Baranda, et al.*, which is used with a steel rope, would yield a 64 mm sheave.

Even if it were possible to say that there were some motivation for using a 64 mm sheave with the belt of *Yaginuma*, the ratio of the *Yaginuma* groove width (1.5 mm) to the *Baranda, et al.* sheave diameter (64 mm) would be .023. That is outside of the range recited in Applicant's

claims. Therefore, even if the combination could be made, the result is not what is claimed and there is no *prima facie* case of obviousness.

The 60% reduction mentioned by *Baranda, et al.* pertains to aramid ropes. Since the 320 mm dimension is stated as used with steel ropes, Applicant submits that the 60% reduction associated with aramid ropes is not relevant to that dimension.

No motivation for combining the 320 mm sheave in *Baranda, et al.* with the belt from *Yaginuma* can be found from within the references. Taking *Baranda, et al.'s* teachings as they are properly understood by one skilled in the art, would lead somebody in the opposite direction of what the Examiner contends. *Baranda, et al.* teach using a belt instead of a steel rope, in part, to be able to reduce sheave size. In other words, *Baranda, et al.* teach away from using such a large sheave, which is appropriate for steel ropes, in connection with a belt as disclosed in *Baranda, et al.* or *Yaginuma.* Nothing in the *Yaginuma* reference would lead one skilled in the art to go in the opposite direction, either. There is no motivation for making the combination and no *prima facie* case of obviousness.

Additionally, several of the Examiner's conclusions are not based on the teachings of the references and Applicant hereby expressly disagrees with the Examiner's conclusions in paragraphs 13, 17, 21, 25, 29, 30 and 51. If the Examiner is going to maintain the position taken in each of those paragraphs, Applicant respectfully submits that the Examiner must provide some evidence from the art to support those conclusions.

Additionally, some of Applicant's claims contain limitations that cannot possibly be derived from the *Baranda, et al.* and *Yaginuma* references, even if they could somehow be combined. Claims 5 and 6, for example, include using speed information as part of a selection of

a ratio between a groove width and a sheave diameter. There is nothing within the art to suggest what is claimed in claims 5 and 6, for example.

The additional teachings of *Aulanko, et al.* do not remedy the defect in the proposed combination of *Baranda, et al.* and *Yaginuma*. The combination cannot be made as explained above. Therefore, there is no *prima facie* case against claim 7, either. Even if the combination could be made, nothing within it suggests using speed information as part of a ratio selection consistent with Applicant's claims.

Applicant respectfully traverses the rejections under 35 U.S.C. §103 based upon the proposed combination of *Baranda, et al.*, *Yaginuma* and *Hull*. *Baranda, et al.* and *Yaginuma* cannot be combined for the reasons stated above. The proposed addition of the teachings of *Hull* does not remedy the defect in the base combination and there is no *prima facie* case of obviousness.

Applicant respectfully traverses the rejection of claim 17 under 35 U.S.C. §103 based upon *Hull*. Applicant respectfully disagrees with the Examiner's conclusion in paragraph 65 of the Office Action. The radius of curvature of 0.004 inches in *Hull* is at the inside of the grooves, not at an end of the grooves that could correspond to a fillet. Therefore, that radius of curvature (0.004 inches) is not the same as a fillet radius of curvature and there is no *prima facie* case of obviousness.

Applicant notes that *Hull* teaches a free end radius of the longitudinal grooves of 0.01 inches in one example, which is approximately .25 mm. Even with this teaching, there is no *prima facie* case of obviousness because there is no motivation for incorporating a feature from a longitudinal groove in *Hull* into an elevator belt arrangement. As described in the background of Applicant's disclosure, grooves on elevator belts introduce the possibility for noise and vibration.

Hull teaches that the longitudinal grooves on *Hull's* endless power transmission belt are machined or cut into the belt material. There is no motivation for machining or cutting in a groove into an elevator belt assembly because that only introduces the potential for drawbacks such as noise and vibration during operation. Further, there is no motivation for incorporating a feature of a longitudinal groove into a transverse groove. If the supposed motivation provided by the Examiner existed, *Hull* would have incorporated that into the transverse grooves of that reference, for example.

Applicant believes that this case is in condition for a allowance. If the Examiner believes that a telephone conference will facilitate moving this case forward to being issued, Applicant's representative will be happy to discuss any issues regarding this application and can be contacted at the telephone number indicated below.

Applicant believes that additional fees in the amount of $200.00 are required for one additional independent claim. A Credit Card Payment Form is included for payment of this fee.

Respectfully submitted,

CARLSON, GASKEY & OLDS

By: _____

David J. Gaskey, Reg. No. 37,139
400 W. Maple Rd., Ste. 350
Birmingham, MI 48009
(248) 988-8360

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CERTIFICATE OF FACSIMILE

I hereby certify that this Response, relative to Application Serial No. 10/501,659, is being facsimile transmitted to the Patent and Trademark Office (Fax No. (571) 273-8300) on February 1, 2006.

Theresa M. Palmateer

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